

FRANKEL C54234
FILE NO. P1-9

facility file:

2162252 - R8 SDMS

Frankel Manufacturing Company
EPA I.D. No. COD980954234

U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION VIII
HAZARDOUS WASTE BRANCH

RCRA INSPECTION REPORT

DATE OF INSPECTION: August 11, 1986

FACILITY: Frankel Manufacturing Company

LOCATION: 5125 Race Court
Denver, Colorado

CONTACT: David Epstein

NOTIFICATION: Generator

TYPE OF INSPECTION: For EPA to examine if Frankel should be considered a LDF

PARTICIPANTS: Patricia Brechlin, EPA
Nancy Jackson, CDH
David Epstein, Frankel

WEATHER CONDITIONS: 85° F

TIME IN: 10:25 a.m.

TIME OUT: 11:55 a.m.

Patricia Brechlin and Nancy Jackson arrived at Frankel Manufacturing Company at approximately 10:25 a.m. and requested to see David Epstein. Ms. Brechlin was asked for identification for which she presented her credentials. Mr. Epstein met the inspectors at approximately 10:45 a.m. Ms. Brechlin, Ms. Jackson, and Mr. Epstein went into Mr. Epstein's office. Ms. Brechlin then proceeded to explain the purpose of the inspection was for EPA to examine if Frankel should be considered a land disposal facility according to the Colorado Department of Health's recommendation.

According to the Federal Register Volume 50, No. 186, page 38947, "... the Agency interprets the term 'land disposal facilities' to encompass the following types of facilities: landfills; land treatment units; surface impoundments for disposal, treatment, or storage; waste piles; and Class I hazardous waste underground injection wells." Mr. Epstein was asked the following five questions based on this definition:

- (1) Do you have any landfills?
- (2) Do you have any land treatment units?
- (3) Do you have any surface impoundments?
- (4) Do you have any waste piles?
- (5) Do you have any Class I hazardous waste underground injection wells?

Mr. Epstein asked for a clarification of what was meant by a land treatment unit, surface impoundment, and a waste pile. He then responded "no" to all questions. Ms. Brechlin asked Mr. Epstein if Frankel currently generates any hazardous waste. Mr. Epstein responded saying that they do not generate waste, but it is a by-product of operations. Ms. Brechlin asked him how they dispose of their waste. Mr. Epstein said that it is taken off site, but some waste is probably in drums now.

Ms. Jackson inquired about how they are disposing of their "mop water". Mr. Epstein informed the inspectors that Frankel has a letter from the sewage treatment plant stating that they can dispose of mop water to the sewer.

The two inspectors and Mr. Epstein then went to look at the hazardous waste manifests and six drums which contained hazardous waste (photos 1 and 2). The group then went outside to look at the site of the drum storage area (photos 3 and 4). All of the drums have been removed, however, at one time over 250 drums had been stored there. According to Ms. Jackson, beneath the cement floor of the drum storage area are culverts which discharge to the South Platte River. Ms. Jackson also said that soil samples taken at the site show that solvents had been dumped there.

The inspectors waited as copies of several documents were made as requested by Ms. Jackson (see Notice of Inspection). Ms. Brechlin presented the Notice of Inspection form to Mr. Epstein. The inspectors left the facility at approximately 11:55 a.m.

Prepared by:

Patricia Brechlin 8/27/86
Patricia Brechlin Date
EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY (REGION VIII)
1860 Lincoln, Denver, CO 80295

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PROGRAM

NOTICE OF INSPECTION

- ☒ Resource Conservation and Recovery Act (RCRA) Public Law 94-580, as amended.
☐ Toxic Substances Control Act (TSCA) Public Law 94-469, as amended.
☐ Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) Public Law 92-516, as amended.

Date 8/11/86	Inspector # 4028	Daily Seq. 2	Hour IN: 10:25 OUT: 11:18	CMO Fac.	Facility name Franklin Manufacturing	DUNS # 0098095423
Fac. Func.	Invest. Type	FATES Reason	RCRA: Gen. () Transp. () TSD ()	Street 5125 Race Court		
Facility Representative(s) David Epstein			Title General Manager		City Denver	State CO
Phone # (977) - (9900)					Zip	

Reason for Inspection: Entry by Consent: ☒ Warrant: ☐
☒ To determine the extent of compliance with the above referenced law, which may require the collection of samples, documents, and/or photographs.
☐ Other (Specify) _____
Violations of above referenced law are suspected from information or complaint. Yes ☐ No ☐

Samples, Documents, and/or Photos collected (describe below)	Medium	Date to Lab
1. 4 photos		
2. 1985 & 1986 copies of manifests		
3. wastewater treatment appeal letter		
4. hazardous waste log		
5. requested copies of personnel training plan		
6. requested copies of contingency plan		

Samples requested and received by facility: ☐ Yes ☐ No
If yes: ☐ Duplicate. ☐ Split. ☐ Photos (To be received when processed.)

This inspection has revealed the following probable violations of EPA laws or regulations.

1. requested copy of final clean-up reports

The facts established by this inspection will be reviewed by personnel in the EPA Regional Office.
A final determination of your facility's compliance with EPA regulations will be made as a result of this review.
The review may reveal additional violations.

Receipt of this Notice of Inspection
is acknowledged.

Signature of Lead Inspector

Patricia Buchli

Assisting Inspectors (EPA/Contr./State)

Theresa Bon

(Signature of facility representative)



OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: hazardous waste drum storage area
 LOCATION: Frankel Manufacturing
5125 Race Court
 COUNTY: Denver STATE: Colorado
 DATE: 8-11-86 TIME: _____
 PHOTOGRAPHER: P. Brechlin
 FILM: _____ ASA: _____ t: _____ f: _____
 LOCATION OF NEGATIVE: Region VIII files
 PHOTOGRAPH #: 1 FILE #: CD980954234
 WITNESS: N. Jackson TITLE: _____
 WITNESS' EMPLOYER: CDH



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 LOCATION OF NEGATIVE: Region VIII files
 PHOTOGRAPH #: 2 FILE #: CD980954234
 WITNESS: N. Jackson TITLE: _____
 WITNESS' EMPLOYER: CDH

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OFFICIAL PHOTOGRAPH
ENVIRONMENTAL PROTECTION AGENCY

SUBJECT: old drum storage area
 LOCATION: Frankel Manufacturing
5125 Race Court
 COUNTY: Denver STATE: Colorado
 DATE: 8-11-86 TIME: _____
 PHOTOGRAPHER: P. Brechlin
 FILM: _____ ASA: _____ t: _____ f: _____
 LOCATION OF NEGATIVE: Region VIII files
 PHOTOGRAPH #: 3 FILE #: CD980954234
 WITNESS: N. Jackson TITLE: _____
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 WITNESS: N. Jackson TITLE: _____
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